

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:  
RAFAEL ANGEL CASIANO TORRES  
Social Security: xxx-xx-1125**

**Address:  
URB. CONDADO MODERNO  
L35 CALLE 16  
CAGUAS, PR 00725**

**DEBTOR**

**CASE NO.  
22-03446-EAG/C.AR**

**CHAPTER 13**

**RESPONSE TO THE CHAPTER 13 TRUSTEE'S  
UNFAVORABLE RECOMMENDATION**

**TO THE HONORABLE COURT:**

**COMES NOW** the Debtor, represented by Legal Partners, PSC., and through the undersigned attorney respectfully represents and prays as follows:

1. The Chapter 13 Trustee ["the Trustee"] issued an UNFAVORABLE recommendation objecting the plan dated May 19, 2023, alleging that the plan cannot be confirmed for various reasons. In response, the Debtor presents this motion.
2. Since the recommendation objecting the confirmation of the plan was issued, the following changes have occurred in the case addressing some or all of the Trustee's comments. The Trustee's recommendation does not consider the following changes:
  - a. An amended Plan was filed, see Docket entry no. 64.
  - b. Amended schedules C, I & J were filed, see Docket entry no. 59.
  - c. The documents requested were provided, see Docket entry no. 60.
  - d. A stipulation with EMI Equity resolving the motion to dismiss filed at Docket entry no. 44 was filed, see stipulation filed at Docket entry no. 62.
3. The Debtor disagrees with the Trustee's recommendation objecting the plan, as the same does not take into considerations the previously mentioned changes.

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*In re Rafael Angel Casiano Torres*

**WHEREFORE** the Debtor prays from this Honorable Court to deny the Chapter 13 Trustee's recommendation and to confirm the plan overruling Trustee's unfavorable recommendation objecting the confirmation of the plan, with any further relief that is just and proper.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court **using the CM/ECF system** which will send notification, upon information and belief, of such filing to: **Monsita Lecaroz Arribas, Esq.**, U.S. Trustee's Office, **José R. Carrión, Esq.**, **Jaime Ruiz Saldaña, Esq.**, **Maristella Sánchez Rodríguez, Esq.**, **Wallace Vázquez Sanabria, Esq.**, **José M. Prieto Carballo, Esq.**; **Lyssette A. Morales Vidal, Esq.**; **Maristella Sánchez Rodríguez, Esq.**; **Carlos A. Quilichini Paz, Esq.**, in addition to any and all parties registered in this case to receive CM/ECF Notices. We will serve by regular mail this document to any the above-named persons, upon knowing that they are non CM/ECF participants.

**RESPECTFULLY SUBMITTED.**

In Carolina, Puerto Rico, June 1, 2023

**LEGAL PARTNERS, P.S.C.**  
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**/s/Juan M. Suárez-Cobo**  
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